Online Consumer Privacy Policy

Last Updated and Effective: October 2022

Your privacy is important to us. This Consumer Privacy Policy ("Privacy Policy") explains how we collect, share, use, and protect your personal information through your online and offline interactions with us. This Privacy Policy may include references to our other privacy policies which serve different purposes under various laws and regulations that apply to us.

1. CATEGORIES OF INFORMATION WE COLLECT ONLINE AND THROUGH OUR MOBILE APPLICATIONS

We collect the following categories of personal information when you visit or use our website havencu.com and when you use our applications on your mobile device (please note that some categories overlap):

A. Identifiers	A real name or alias, postal address, signature, home phone number or mobile phone number, account number, credit card number, debit card number, insurance policy number or other financial information, IP address and related electronic information, physical characteristics or description, email address, account name, Social Security number, driver license number or state identification card number, passport number or other similar identifiers.
B. Protected classification characteristics under state or federal law.	Date of birth/age, race, ancestry, national origin, citizenship, marital status, medical, physical or mental conditions, sex (including gender, gender identity, gender expression), veteran or military status.
C. Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
D. Biometric Information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as fingerprints and faceprints.
E. Geological Data	Physical location or movements. For example, city, state, country, and ZIP code associated with your IP address or derived through Wi-Fi triangulation, and, with your permission in accordance with your mobile device settings, and precise geolocation information from GPS-based functionality on your mobile devices.
F. Sensory Data	Audio, electronic, visual, or similar information.
G. Professional or employment-related information	Current or past job history and salary.
H. Inferences drawn from other personal information	Profile reflecting a person's preference, characteristics, psychological personal information. Trends, predispositions, behavior, attitudes, abilities, and aptitudes.

2. CATEGORIES OF INFORMATION WE COLLECT THROUGH DIRECT INTERACTIONS

We collect the following categories of personal information when you or your authorized agent visit our premises, speak with one of our employees or representatives, use one of our automated teller machines (ATMs) or through other personal interactions with us (please note that some categories overlap):

A. Identifiers	A real name or alias, postal address, signature, home phone number or mobile phone number, account number, credit card number, debit card number, insurance policy number or other financial information, IP address and related electronic information, physical characteristics or description, email address, account name, Social Security number, driver license number or state identification card number, passport number or other similar identifiers.
B. Protected classification characteristics under state or federal law.	Date of birth/age, race, ancestry, national origin, citizenship, marital status, medical, physical or mental conditions, sex (including gender, gender identity, gender expression), veteran or military status.
C. Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
D. Biometric Information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as fingerprints and faceprints.
E. Geological Data	Physical location or movements. For example, city, state, country, and ZIP code associated with your IP address or derived through Wi-Fi triangulation, and, with your permission in accordance with your mobile device settings, and precise geolocation information from GPS-based functionality on your mobile devices.
F. Sensory Data	Audio, electronic, visual, or similar information.
G. Professional or employment-related information	Current or past job history and salary.
H. Inferences drawn from other personal information	Profile reflecting a person's preference, characteristics, psychological personal information. Trends, predispositions, behavior, attitudes, abilities, and aptitudes.

3. CATEGORIES OF SOURCES OF INFORMATION WE COLLECT

We obtain the categories of personal information listed above from one or more of the following categories of sources:

From You or Your Authorized Agent

We may collect information directly from you or your authorized agent. For example, when you provide us your name and Social Security number to open an account and become a member. We also collect information indirectly from you or your authorized agent. For example, through information we collect from our members in the course of providing services to them.

From Our Website and Applications That You Access on Your Mobile Device

We collect certain information from your activity on our website, havencu.com, and your use of applications on your mobile device. We may
collect your IP address, device and advertising identifiers, browser type, operating system, Internet service provider ("ISP"), pages that you visit before and after visiting our website, the date and time of your visit, information about the links you click and pages you view on our website, and other standard server log information. We may also collect your mobile device's GPS signal, or other information about nearby Wi-Fi access points and cell towers.

The Role of Cookies and Other Online Tracking Technologies

We, or our service providers, and other companies we work with may deploy and use cookies, web beacons, local shared objects and other tracking technologies for various purposes, such as fraud prevention and to promote our products and services to you. Some of these tracking tools may detect characteristics or settings of the specific device you use to access our online services.

"Cookies" are small amounts of data a website can send to a visitor's web browser. They are often stored on the device you are using to help track your areas of interest. Cookies may also enable us or our service providers and other companies we work with to relate your use of our online services over time to customize your experience. Most web browsers allow you to adjust your browser settings to decline or delete cookies but doing so may degrade your experience with our online services.

Clear GIFs, pixel tags, or web beacons-which are typically one-pixel, transparent images located on a webpage or in an email or other message-or similar technologies may be used on our sites and in some of our digital communications (such as email or other marketing messages). They may also be used when you are served advertisements, or you otherwise interact with advertisements outside of our online services. These are principally used to help recognize users, assess traffic patterns, and measure site or campaign engagement.

Local Shared Objects, sometimes referred to as "flash cookies" may be stored on your hard drive using a media player or other software installed on your device.

Local Shared Objects are similar to cookies in terms of their operation but may not be managed in your browser in the same way.

"First party" cookies are stored by the domain (website) you are vising directly. They allow the website's owner to collect analytics data, remember language settings, and perform useful functions that help provide a good experience. "Third-party" cookies are created by domains other than the one you are visiting directly, hence the name third- party. They may be used for cross-site tracking, retargeting and ad-serving. We also believe that cookies fall into the following general categories:

- Essential Cookies: These cookies are technically necessary to provide website functionality. They are a website's basic form of memory, used to store the preferences selected by a user on a given site. As the name implies, they are essential to a website's functionality and cannot be disabled by users. For example, an essential cookie may be used to prevent users from having to log in each time they visit a new page in the same session.
- Performance and Function Cookies: These cookies are used to enhance the performance and functionality of a website but are not essential to its use. However, without these cookies, certain functions (like videos) may become unavailable.
- Analytics and Customization Cookies: Analytics and customization cookies track user activity, so that website owners can better understand how their site is being accessed and used.

Online Advertising & Online Behavioral Advertising

You may see advertisements when you use many of our online services. These advertisements may be for our own products or services (including pre-screened offers of credit) or for products and services offered by third parties. Which advertisements you see may be determined using the information we or our affiliates, service providers and other companies that we work with have about you, including information about your relationships with us (e.g., types of accounts held, transactional information, location of banking activity). To that end, where permitted by applicable law, we may share with others the information we collect from and about you.

Third-party service providers in connection with our services or our business purposes

We collect information from third-party service providers that interact with us in connection with the services we perform or for our operational purposes. For example, a credit report we obtain from a credit bureau to evaluate a loan application. Another example is a third-party service provider that provides us information to help us detect security incidents and fraudulent activity.

Information we collect from third parties for a commercial purpose

We collect information from third parties for our commercial purposes. We partner with a limited number of third-party analytics and advertising firms. These third parties may use cookies or code processed by your browser to collect public information about your visits to our and other websites in order to provide customized experiences, advertisements or services. These parties may also collect information directly from you by contacting you telephonically, via email or through other communication channels. We do not disclose any information about you to such third parties except as permitted by applicable laws and regulations, and we require such third parties to follow applicable laws and regulations when they collect information from you to transfer such information to us.

4. HOW WE USE YOUR PERSONAL INFORMATION

We may use or disclose personal information we collect for one or more of the following operational or other notified purpose ("business purpose"):

- To fulfill or meet the reason for which the information is provided. For example, you apply for a loan, and we use the information in your loan application to give you the loan.
- To provide you with information, products or services that you request from us.
- To provide you with email alerts, event registrations or other notices concerning our products or services, or events or news, that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our website and present its contents to you.
- For testing, research, analysis to improve our products and services and for developing new ones.
- To protect the rights, property or safety of us, our employees, our members or others.
- To detect security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information.

We also use your personal information to advance our commercial or economic interests ("commercial purpose"), such as advertising our membership, products and services, or enabling or effecting, directly or indirectly, a commercial transaction.

5. ALLOWING YOU TO USE FEATURES WITHIN OUR SITES AND MOBILE APPS

When you grant us access to personal information from your device such as contact lists or geo-location when you request certain services that requires such access, for example locating an ATM.

6. SHARING PERSONAL INFORMATION

When we disclose personal information for a business or commercial purpose, we enter a contract that describes the purpose and requires the recipient to keep that personal information confidential and not to use it for any purpose except performing the contract.

We disclose your personal information for a business or commercial purpose to the following categories of third parties:

- Our third-party service providers
- Our affiliated websites and businesses in an effort to bring you improved service across our family of products and services, when permissible under relevant laws and regulations
- Other companies to bring you co-branded services, products or programs
- Third parties that help us advertise, products, services or membership with us to you
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you
- Third parties or affiliates in connection with a corporate transaction, such as a sale, consolidation or merger of our financial institution or affiliated business; and
- Other third parties to comply with legal requirements such as the demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights, or other applicable policies; to address fraud, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property or security of our customers/members or third parties.

7. SELLING PERSONAL INFORMATION

We do not sell your personal information for monetary consideration. However, there may be instances where we disclose or share your information with a third party for other valuable consideration. When we refer to “sell,” “selling,” “sale” or “sold” in this Privacy Policy, we are referring to disclosure or sharing of personal information for valuable consideration other than money.

In the preceding 12-months, we have not sold any personal information and, going forward, we will not sell your information. If this changes, we will notify you in accordance with applicable law.

8. YOUR RIGHTS AND CHOICES

This section describes your rights and choices regarding how we collect, share, use, and protect your personal information, how to exercise those rights, and limits and exceptions to your rights and choices.

Exceptions

We will first address the exceptions where your rights and choices in Section 6 do not apply to you:

- If you are not a California resident.
- If we collected personal information covered by certain financial sector specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994. How we collect, share, use and protect your personal information covered under the GLBA is covered under our federal GLBA privacy notice. Visit our privacy policy page.
- “Aggregated information” that relates to a group or category of consumers, from which consumer identities have been removed, that is not linked or reasonably linkable to any consumer or household, including via a device. “Deidentified information” that cannot reasonably identify, relate to, describe, be capable of being associated with, or be linked, directly or indirectly, to you, provided that we have: (i) implemented technical safeguards that prohibit reidentification of your information; (ii) implemented business processes that specifically prohibit reidentification of the information; (iii)

have business processes to prevent inadvertent release of deidentified information; and (iv) make no attempt to reidentify the information.

- The information we have is publicly available from government records.

Access to Specific Information and Data Portability Rights

If the above exceptions do not apply, and you have not made this request more than twice in a 12-month period, you have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months from the date we receive your request. Once we receive and confirm your request and verify that the request is coming from you or someone authorized to make the request on your behalf, we will disclose to you or your representative:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties to whom we sold or disclosed the category of personal information for a business or commercial purpose. The business or commercial purpose for which we sold or disclosed the category of personal information.
- The specific pieces of personal information we collected about you in a form that you can take with you (also called a "data portability request").

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collect from you and retained, subject to certain exceptions. Once we receive and verify your request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies. We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the businesses' deletion of the information is likely to render impossible or seriously impair the achievement of such research, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, Deletion and Correction Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at 1-(877) 992-8663
- Visiting havencu.com.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

When we receive a verifiable request from your "authorized agent," which is any person or legal entity registered with the California Secretary of State that you have authorized to act on your behalf, we will require:

- Submission of a written document signed by you with your permission for the authorized agent to submit a verifiable request on your behalf and require the authorized agent to verify its own identity to us; or
- Require your authorized agent to furnish a copy of a power of attorney pursuant to California Probate Code sections 4000 to 4465 and require the authorized agent to verify its own identity to us.

We will deny a request from an agent that does not submit proof that they have been authorized by you to act on your behalf and cannot verify their own identity to us.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing delivered by the USPS.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request.

Right of Non-Discrimination

We will not discriminate against you for exercising any of your rights in this Privacy Policy and under applicable laws. Unless permitted by law, we will not.

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price for goods or services or different level or quality of goods or services.

9. DO NOT TRACK ("DNT") SIGNALS

We do not employ tracking signals on our website and, therefore, we are not able to recognize DNT signals. It tracking mechanisms are utilized for future releases of our website, we will update this Privacy Policy to disclose how we respond to DNT signals.

10. CHANGES TO OUR PRIVACY POLICY

We reserve the right to amend this Privacy Policy at our discretion and at any time. When we make changes to this Privacy Policy, we will notify you by email or through a notice on our website homepage.

11. CHILDREN'S ONLINE INFORMATION POLICY

Our website is not intended for children under the age of 13. We do not knowingly collect, maintain, or use personally identifiable information from our website about children under the age of 13 without parental consent. For more information about the Children's Online Privacy Protection Act (COPPA), visit the Federal Trade Commission website: www.ftc.gov.

12. LINKING TO THIRD-PARTY WEBSITES

We may provide links to websites that are owned or operated by other companies ("third-party websites"). When you use a link online to visit a third-party website, you will be subject to that website's privacy and security practices, which may differ from ours. You should familiarize yourself with the privacy policy, terms of use and security practices of the linked third-party website before providing any information on that website. We are not responsible for the third-party website's use, collection, sale or sharing of your personal information.

13. SECURITY

We use reasonable physical, electronic, and procedural safeguards that comply with federal standards to protect and limit access to personal information. This includes device safeguards and secured files and buildings.

Please note that information you send to us electronically may not be secure when it is transmitted to us. We recommend that you do not use unsecure channels to communicate sensitive or confidential information (such as your Social Security number) to us.

14. CONTACT INFORMATION

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights, or to request changes to any of your personally identifiable information that we have collected, please do not hesitate to contact us at:

- Phone: 1-(877) 992-8663
- Website: havencu.com.